

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In Re:

Eagle Roadways, Inc.  
Case No: 21-10174/KCF  
Straffi v. Hyundai Capital America,  
Inc. d/b/a Hyundai Motor Finance  
Adv. Case No: 22-01235/KCF

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Chapter: 7  
Judge: KCF

**NOTICE OF PROPOSED COMPROMISE or SETTLEMENT OF CONTROVERSY**

Daniel E. Straffi, Trustee, in this case proposes a compromise, or to settle a claim and/or action as described below. If you object to the settlement or compromise, you must file a written objection with the Clerk of the United States Bankruptcy Court, and serve it on the person named below not later 7 days before the hearing date.

Address of the Clerk: United States Bankruptcy Court  
Office of the Clerk  
Clarkson S. Fisher US Courthouse  
402 East State Street  
Trenton, NJ 08608

If an objection is filed, a hearing will be held before the Honorable Kathryn C. Ferguson on January 10, 2023 at 10:00 a.m. at the United States Bankruptcy Court, courtroom no. 2, 402 East State Street, Trenton, NJ 08608 (hearing to be scheduled for at least 28 days from the date of the filing of the notice). If no objection is filed the clerk will enter a *Certification of No Objection* and the settlement may be completed as proposed.

Nature of action: The Trustee filed a complaint against Defendant, Hyundai Capital America, Inc. d/b/a Hyundai Motor Finance (hereinafter "Hyundai") to avoid and recover alleged fraudulent transfers under §§544, 548 and 550 of the United States Bankruptcy Code. Default judgment was entered against Hyundai on September 2, 2022 in the sum of \$21,272.78. Hyundai has alleged defenses to the entry of the default judgment.

Pertinent terms of settlement: The full terms of settlement are set forth in the Stipulation of Settlement filed with the Clerk of the Court. Hyundai has agreed to pay the bankruptcy estate the sum of \$15,000.00 and waives all claims against the estate of whatsoever nature, including under §502(h) of the Code. Said payment will be in full satisfaction of all claims against Hyundai in the adversary proceeding if and when the Court approves the settlement. The parties will bear their own costs including any attorney's fees and court costs. The Trustee believes the settlement is fair and reasonable given the risks and costs of litigation.

Objections must be served on, and requests for additional information directed to:

Name: Daniel E. Straffi, Esq.

Address: 670 Commons Way, Toms River, NJ 08755

Telephone No.: (732) 341-3800